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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re :
: Chapter 11
DELPHI CORPORATION, *et al.* :
: Case No. 05-44481 (ajg)
Debtor. :
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NOTICE OF RECLAMATION

PLEASE TAKE NOTICE, that on October 19, 2005, Security Plastics Division/NMC, LLC ("Security") served upon Debtor Delphi Corporation ("Delphi") a timely written demand for reclamation of certain goods (i.e. automotive parts, goods and equipment) shipped by Security to Delphi with an aggregate value of at least \$48,567.76, and as described in greater detail in such written demand. (A copy of this written demand is annexed hereto as Exhibit "A").

Security respectfully requests permission, pursuant to 11 U.S.C. § 546(c)(1), to reclaim and recover from Delphi the goods specified in Exhibit "A" and that the Bankruptcy Court direct Delphi to return these goods to Security promptly. Alternatively, in the event the Court denied reclamation, Security respectfully requests the Court (i) to grant Security, pursuant to 11 U.S.C. § 503(b) and 11 U.S.C. § 546(c)(2)(A), and administrative priority claim in the amount of at least \$48,567.76, or (ii) to grant Security pursuant to 11 U.S.C. § 546(c)(2)(B), a secured claim in the amount of at least \$48,567.76, as if Security held a validly perfected lien and security interest in such an amount.

Security expressly reserves all of its rights and remedies available under the United States Bankruptcy Code, including but not limited to the right to file an adversary proceeding, and to supplement this Notice.

Dated: Westbury, New York
October 18, 2005

PRYOR & MANDELUP, LLP
Attorneys for Security Plastics Division/NMC, LLC

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